IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

ARNOLDO CARRILLO, et al,

Plaintiffs,

v. No. 1:15-cv-01111-WPL-GBW

THE NEW MEXICO RACING COMMISSION, et al,

Defendants.

JOINT MOTION STIPULATING TO EXTENSION OF DISCOVERY AND PRETRIAL DEADLINES

COME NOW the parties, Plaintiffs, Arnoldo Carrillo and Santa Fe Horse Racing By Carrillo's, LLC ("Carrillo"), by and through Christa M. Okon, the Okon Law Firm; and Philip B. Davis and Nicholas Davis, the Law Office of Philip B. Davis, and Defendants, the New Mexico Racing Commission, the Board of Stewards of Sunland Park, and David Keiter, Ed L'Ecuyer and David Hart, by and through their counsel of record, Sean Olivas and Zachary Cormier, Keleher & McCleod, P.A., and hereby stipulate and move the Court to adopt their stipulation as to the extension of all current discovery and pretrial deadlines in this matter for a period of sixty (60) days, as follows:

1. The termination date for discovery, except for expert-related discovery, shall be May 12, 2017;

2. Motions relating to discovery shall be filed by June 2, 2017;

3. Disclosure of Plaintiffs' experts and experts' reports shall be made by May 15, 2017;

4. Disclosure of Defendants' experts and experts' reports shall be made by June 14, 2017;

5. The termination date for expert-related discovery shall be July 14, 2017;

6. Pretrial motions, other than motions in limine, shall be filed by August 12, 2017.

All other discovery and pretrial-related matters shall be controlled by the Order Setting Pretrial Deadlines and Briefing Schedule (9/23/16) [Doc. 103}.

Respectfully submitted,
THE OKON LAW FIRM

By: */s/ Christa M. Okon*
Christa M. Okon
The El Patio Building, Suite B
117 N. Guadalupe Street
Santa Fe, NM 87501
(505) 989-4500
cmokonlaw@aol.com

And by: THE LAW OFFICE OF PHILIP B. DAVIS

/s/ Philip B. Davis
Philip B. Davis
Nicholas T. Davis
100 Lomas Blvd. NW
Albuquerque, NM 87102
(505) 242-1904
(505) 242-1864 (facsimile)
davisp@swcp.com
davisn@swcp.com

Approved via email February 24, 2017
Sean Olivas
Zachary Cormier
Keleher & McCleod, PA
P.O. Box AA
Albuquerque, NM 87103
(505) 346-4646
so@keleher-law.com
zc@keleher.law.com

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing pleading was filed via the Court's electronic filing system and served on the NMRC Defendants this 28th day of February, 2017.

/s/ *Christa M. Okon*